

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Wilmington Trust, National Association, as Trustee for
the Registered Holders of Wells Fargo Commercial
Mortgage Securities, Inc., Multifamily Mortgage Pass-
Through Certificates, Series 2019-SB65,

Plaintiff,

v.

Kunba, LLC, Robert Khomari, The New York City
Department of Housing Preservation and Development,
County Oil Company, Inc. and John Doe No. I through
John Doe No. XXX, inclusive, the last thirty names
being fictitious and unknown to Plaintiff, the persons or
parties intended being the tenants, occupants, persons,
or corporations, if any, having or claiming an interest in
or lien upon the premises described in the Complaint,

Defendants.

Case No. 25-CV-01696 (DLC)

NOTICE OF MOTION FOR DEFAULT JUDGMENT

PLEASE TAKE NOTICE that upon the accompanying Declaration of Carter J. Wallace with exhibits attached, Plaintiff Citibank N.A., as Trustee, for the benefit of the Holders of CF 2020-P1 Mortgage Trust Commercial Mortgage Pass-Through Certificates, Series 2020-P1 (“**Lender**”), hereby moves this Court, the United States District Court for the Southern District of New York, at May 29, 2025 at 2:30 PM., in Courtroom 18B, 500 Pearl Street, New York, New York 10007, for an Order Granting it Default Judgment against County Oil Company, Inc., and to amend the caption removing John Doe No. I through XXX, together with such other and further relief as this Court may deem just and proper.

Dated: New York, New York
May 2, 2025

Respectfully submitted,

POLSINELLI PC

By: /s/ Carter J. Wallace
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